



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

Edward A. Hogan
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

OCT 09 1998

Re: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ISRA Case #86009
Remedial Action Reports Dated: January 28, 1998, April 28, 1998 and June 30, 1998

Dear Mr. Hogan:

Please be advised that the New Jersey Department of Environmental Protection (NJDEP) has completed its review of the above referenced Remedial Action Reports (RARs). The NJDEP's comments regarding the Remedial Action Reports are noted below:

I Soil Comments

1. Hexcel indicates that they are currently in the process of developing a plan for a comprehensive and fast-track remediation of the site. Hexcel also states that it has reached a point in its negotiations with other parties in the area that it has determined that it will move ahead expeditiously with developing a remediation plan of the Hexcel property alone, independent of other parties' issues. Though there is still a possibility for a regional remedial approach that will incorporate the Hexcel property, Hexcel indicates that they will proceed with its own remediation without waiting for the details of this possibility. Hexcel proposes an October meeting to present the concept of its comprehensive plan followed by a submission of an RAR. The proposal is acceptable. Therefore, Hexcel shall immediately contact the Case Manager to schedule the proposed meeting.

II Ground Water Comments

1. In the May 29, 1997 progress report Hexcel indicated that dense non aqueous phase liquid (DNAPL) recovery was usually not attempted at a well when DNAPL is observed on the probe unless the product interface meter signals its presence because Hexcel's experience has been that in such cases a significant amount of DNAPL was not recovered. In the May 27, 1998 letter, the NJDEP accepted Hexcel's response, however, after reviewing the following three progress reports, the NJDEP questions the value of using an interface probe to monitor for recoverable amounts of DNAPL. In each of the three reports, Hexcel indicates that DNAPL was observed on the probe after checking numerous wells, but that in none did the interface probe signal that DNAPL was present. Based on this record, the NJDEP questions why the interface probe is failing to signal the presence of product and questions whether the results of the interface probe monitoring are a reliable indication of the amount of DNAPL present. Therefore, in the future, whenever evidence of DNAPL is detected using the interface probe, whether measured by the probe or just observed on the probe, Hexcel shall either use a bottom filling bailer to confirm that a recoverable amount of DNAPL is not present or shall initiate product recovery at that well.



MW32

2. During the fourth quarter of 1997, Hexcel replaced abandoned well MW32 with well MW32B. Hexcel indicates that MW32B will be included in the water elevation, LNAPL and DNAPL monitoring program. This is acceptable.

Vertical delineation at MW1

3. Hexcel advanced four soil borings in the area of MW1 to determine the depth of bedrock. Bedrock was reportedly encountered at depths of 17' to 22'. Hexcel observes that MW1 is screened from 15'-20' below grade and concludes, therefore, that MW1 is completed just above bedrock. Hexcel concludes that an additional well installed on top of bedrock is not warranted at this time. Hexcel proposes to wait for additional regional information before conducting further work in this area.

Hexcel's proposal is not acceptable. The NJDEP agreed to allow Hexcel to pursue installation of an overburden well rather than a bedrock well for vertical delineation of contamination in the area of MW1 because Hexcel believed that a significant distance was present between the bottom of MW1 and the top of bedrock. Now that Hexcel has demonstrated that this is not the case, Hexcel shall comply with the original requirement for installation of a bedrock well. Hexcel shall submit a schedule for installation of the well. Deferral of the delineation pending availability of regional information is not acceptable as indicated in the NJDEP's May 27, 1998 letter.

Off-site investigation across Saddle River

4. Hexcel gained access to Army Corps of Engineers' well MW8 in October 1997. Hexcel surveyed the elevation of the well and collected measurements to enable mapping of the well. Hexcel measured the depth of the well and the depth to water in the well and checked the well for product. Hexcel obtained a geologic log for the well, which was previously submitted to the NJDEP, and obtained construction information for the well from the Army Corps of Engineers. Hexcel also obtained information on the elevation of the Saddle River channel from a February 1986 NJDEP Division of Water Resources document.

Hexcel concludes that the confining layer present at the Hexcel site is present at the location of Army Corps MW8. Hexcel reports that the elevation of the top of the layer ranges from 13'-13.5' at the Hexcel site in the areas of wells MW10, CW12, CW16 and MW8 and that it occurs at an elevation of 13.7' at Army Corps MW8. Hexcel reports that the well is constructed with 10' of screen set 4' into the confining layer. Hexcel indicates that the elevation of the Saddle River channel bottom is 15' next to Hexcel's MW8 and 14.5' next to MW10.

Based on the information above, Hexcel concludes that Army Corps well MW8 is appropriately constructed to detect DNAPL if present in the area and that Army Corps well MW8 is located in a position suitable to detect any DNAPL that might have migrated under the river from the vicinity of Hexcel's MW8.

Hexcel reports that the Army Corps of Engineers' investigation included extensive chemical testing at MW8 and that the testing indicated no DNAPL in the well and no VOCs, semi-VOCs or PCBs above regulatory concern. Hexcel also reports that no DNAPL was observed in the well during Hexcel's October 1997 investigation.

Hexcel proposes no further action regarding delineation of ground water contamination across Saddle River.

Hexcel's proposal is not acceptable. Hexcel's map shows that Army Corps MW8 is not located directly across Saddle River from Hexcel's MW8 but is located approximately 200' downstream of it. Army Corps MW8 does not appear to be positioned in a location where DNAPL would necessarily be expected to occur if it had migrated under Saddle River from the Hexcel site. Therefore, Hexcel shall submit a revised proposal to investigate the possibility that DNAPL has migrated from the Hexcel site under the Saddle River to the opposite side. The proposal shall account for the locations of all wells located along the Saddle River at the Hexcel site where DNAPL has been detected. The Department recommends that Hexcel submit a proposal for a cone penetrometer investigation.

Hexcel shall submit the results of the ground water sampling performed by the Army Corps of Engineers at MW8.

5. Be advised that the ground water section of the June 30, 1998 RAR is currently being reviewed by the NJDEP. Comments concerning this submission will be provided at a later date.

III General Requirements

1. Hexcel shall submit the results or additional work plans, in triplicate. Please note that only one copy of the Quality Assurance/Quality Control Deliverables is needed.
2. Hexcel shall submit a revised Remedial Action Schedule, pursuant to N.J.A.C. 7:26E-6.5, for NJDEP approval which includes all tasks associated with the remediation of the site within thirty (30) calendar days of the receipt of this letter.
3. Hexcel shall submit summarized analytical results in accordance with the Technical Requirements For Site Remediation (TRSR), N.J.A.C. 7:26E.
4. Hexcel shall collect and analyze all samples in accordance with the sampling protocol outlined in the May, 1992 edition of the NJDEP's "Field Sampling Procedures Manual" and the TRSR, N.J.A.C. 7:26E.
5. Hexcel shall notify the assigned BEECRA Case Manager at least 14 calendar days prior to implementation of all field activities included in the Remedial Action Workplan. If Hexcel fails to initiate sampling within 30 calendar days of the receipt of this approval, any requests for an extension of the required time frames may be denied.
6. Pursuant to the TRSR, N.J.A.C. 7:26E-3.13(c)3v, all analytical data shall be presented both as a hard copy and an electronic deliverable using the database format outlined in detail in the current HAZSITE application or appropriate spreadsheet format specified in the NJDEP's electronic data interchange manual.

For further information related to electronic data submissions, please refer to the Site Remediation Program's (SRP's) home page at the following internet address: <http://www.state.nj.us/dep/srp>. The Regulations and Guidance page of this web site has a section dedicated to HazSite which includes downloadable files, an explanation of how to use these files to comply with the NJDEP's requirements, the SRP's Electronic Data Interchange (EDI) manual, and Guidance for the Submission and Use of Data in GIS Compatible Formats Pursuant to "Technical Requirements for Site Remediation".

7. Pursuant to N.J.S.A. 58:10B-3, a remediation funding source is to be established in an amount equal to or greater than the cost estimate of the implementation of the remediation and shall be in effect for a term not less than the actual time necessary to perform the remediation at the site.

N.J.S.A. 58:10B-3 allows for a change of the amount in the remediation funding source as the cost estimate changes. Please provide the current estimated cost of the remaining remediation required at the site. Any increases in the estimated cost will require an increase in the amount in the Remediation Funding Source to an amount at least equal to the new estimate. Any requests to decrease the amount in the remediation funding source will be reviewed and approved by the NJDEP upon a finding that the current remediation cost estimate will be sufficient to fund all necessary remediation.

If you have any questions, please contact the Case Manager, Joseph J. Nowak, at (609) 292-0130.

Sincerely,



Michael A. Justiniano, Supervisor
Bureau of Environmental Evaluation,
Cleanup and Responsibility Assessment

c: Kris Geller, BEERA
Beverly Phillips, BGWPA
A. William Nosil, Hexcel Corporation
James Higdon, Fine Organics Corporation
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